

Chetty/T

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

USDS SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: SEP 21 2007

Faisal Mustafa, Individually and On Behalf of All
Similarly Situated,

Plaintiff,

v.

Limelight Networks, Inc., Goldman Sachs & Co.,
Morgan Stanley & Co., Inc., Jeffrey Lunsford,
Nathan Raciborski, Allan M. Kaplan, Joseph H.
Gleberman, and Peter J. Perrone,

Defendants.

ECF CASE

Civ. No. 07-CV-7205 (PAC)

STIPULATION AND ~~PROPOSED~~ *PAC*
ORDER EXTENDING
DEFENDANTS' TIME TO
RESPOND PENDING DECISION
ON MOTION TO TRANSFER
VENUE

Hendo Weernink, Individually and On Behalf of
All Those Similarly Situated,

Plaintiff,

v.

Limelight Networks, Inc., Goldman Sachs & Co.,
Morgan Stanley & Co., Inc., Jefferies &
Company, Inc., Piper Jaffray & Co., Friedman,
Billings, Ramsey, & Co., Inc., Jeffrey Lunsford,
Matthew Hale, Walter D. Amaral, Joseph H.
Gleberman, Frederic W. Harman, Mark A. Jung,
Allan M. Kaplan, Peter J. Perrone, David C.
Peterschmidt, Nathan F. Raciborski, and Gary
Valenzuela,

Defendants.

ECF CASE

Civ. No. 07-CIV-7404 (PAC)

Scott Kairalla, Individually and On Behalf of All
Others Similarly Situated,

Plaintiff,

v.

Limelight Networks, Inc., Jeffrey W. Lunsford,
Michael M. Gordon, William H. Rinehart,
Matthew Hale, Nathan F. Raciborski, Walter D.
Amaral, Joseph H. Gleberman, Frederic W.

ECF CASE

Civ. No. 07-CIV-7417 (PAC)

Harman, Mark. A Jung, Allan M. Kaplan, Peter J. Perrone, David C. Peterschmidt, Gary Valenzuela, Goldman Sachs & Co., Jefferies & Company, Inc., Morgan Stanley & Co., Incorporated, Piper Jaffray & Co., and Friedman, Billings, Ramsey, & Co., Inc.,

Defendants.

Tim Radecki, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

v.

Limelight Networks, Inc., Jeffrey W. Lunsford, Matthew Hale, Nathan F. Raciborski, Allan M. Kaplan, Joseph H. Gleberman, Peter J. Perrone, Goldman, Sachs & Co., Morgan Stanley & Co. Incorporated,

Defendants.

ECF CASE

Civ. No. 07-CIV-7394 (PAC)

Benjamin Paul, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

v.

Limelight Networks, Inc.; Goldman Sachs & Co.; Morgan Stanley & Co., Inc.; Jeffrey W. Lunsford; Nathan F. Raciborski; and Allan M. Kaplan,

Defendants.

ECF CASE

Civ. No. 07-CIV-7432 (PAC)

Alice Artis, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

v.

Limelight Networks, Inc., Jeffrey W. Lunsford, Matthew Hale, Nathan F. Raciborski, Michael M. Gordon, William H. Rinehart, Allan M. Kaplan, Walter D. Amaral, Joseph H. Gleberman, Frederic W. Harman, Mark. A Jung, Peter J.

ECF CASE

Civ. No. 07-CIV-7475 (PAC)

Perrone, David C. Peterschmidt, Gary)
Valenzuela, Goldman, Sachs & Co., Morgan)
Stanley & Co., Inc., Jefferies & Company, Inc.,)
Piper Jaffray & Co., and Friedman, Billings,)
Ramsey, & Co., Inc.,)
Defendants.)

WHEREAS, the above-captioned six related class action complaints (the "Actions") have been filed in this Court against defendants Limelight Networks, Inc., Jeffrey W. Lunsford, Matthew Hale, Nathan F. Raciborski, Michael M. Gordon, William H. Rinehart, Allan M. Kaplan, Walter D. Amaral, Joseph H. Gleberman, Frederic W. Harman, Mark. A Jung, Peter J. Perrone, David C. Peterschmidt, Gary Valenzuela (collectively the "Limelight Defendants"), and Goldman, Sachs & Co., Morgan Stanley & Co. Incorporated, Jefferies & Company, Inc., Piper Jaffray & Co., and Friedman, Billings, Ramsey & Co., Inc., (all collectively "Defendants"), alleging violations of the federal securities laws;

WHEREAS, Defendants have agreed through their counsel to accept service pursuant to Federal Rule of Civil Procedure 4(d);

WHEREAS, the Limelight Defendants have advised plaintiffs' counsel that they intend to file a motion to transfer these actions to the United States District Court for the District of Arizona under 28 U.S.C. § 1404(a) ("Motion to Transfer");

WHEREAS, the Limelight Defendants proposed, and plaintiffs in all Actions agree, that it would conserve party and judicial resources if the time for all Defendants to respond, either by answer or by motion, to the Actions was extended until after the Court rules on the Motion to Transfer;

NOW THEREFORE, it is hereby stipulated and agreed by the parties to these Actions, by and through their undersigned counsel and subject to the approval of the Court, as follows:

1. Defendants need not respond to the current complaints in each of the Actions until after the Court's decision on the Motion to Transfer.

2. Following the Court's decision of the Motion to Transfer, or such other time as the parties may agree or as the Court may direct, the parties will meet and confer regarding a schedule for Defendants' response to any of the complaints in the Actions (or a subsequently filed consolidated complaint), whether by motion or by answer.

Dated: September ²⁰ , 2007

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

By: 
Gideon A. Schor

1301 Avenue of the Americas
40th Floor
New York, New York 10019-6022
Telephone: (212) 999-5800
Facsimile: (212) 999-5899

Attorney for Defendants Limelight Networks,
Inc., Jeffrey W. Lunsford, Matthew Hale,
Walter D. Amaral, Joseph H. Gleberman,
Frederic W. Harman, Mark A. Jung, Allan M.
Kaplan, Peter J. Perrone, David C.
Peterschmidt, Nathan F. Raciborski, William H.
Rinehart, and Gary Valenzuela

Dated: September 20, 2007

SHEARMAN & STERLING LLP

By: Alan Goudiss / 18.
Alan S. Goudiss

599 Lexington Avenue
New York, New York 10022

Telephone: (212) 848-4000
Facsimile: (212) 848-7179

Attorneys for Defendants Goldman, Sachs &
Co., Morgan Stanley & Co. Incorporated,
Jefferies & Company, Inc., Piper Jaffray & Co.,
and Friedman, Billings, Ramsey & Co., Inc.,

Dated: September 17, 2007

PASKOWITZ & ASSOCIATES

By: Laurence Paskowitz / 18.
Laurence D. Paskowitz, Esq.

60 East 42nd Street—46th Floor
New York, New York 10165

Telephone: (212) 685-0969
Facsimile: (212) 685-2306

lpaskowitz@pasklaw.com

ROY JACOBS & ASSOCIATES
Roy L. Jacobs, Esq.
60 East 42nd Street
46th Floor
New York, New York 10165

Telephone: (212) 867-1156
Facsimile: (212) 504-8343

Rljacobs@pipeline.com

Attorneys for Plaintiff Faisal Mustafa

Dated: September 17, 2007

WOLF HALDENSTEIN ADLER FREEMAN
& HERZ LLP

By: Gregory M. Nespole /s/
Gregory M. Nespole
Laurence J. Hasson

270 Madison Avenue
White Plains, New York 10016

Telephone: (212) 545-4600
Facsimile: (212) 545-4653

LAW OFFICES OF BRIAN M. FELGOISE, P.C.
Brian M. Felgoise, Esq.
The Pavilion
261 Old York Road – Suite 423
Jenkintown, PA 19046

Telephone: (215) 886-1900
Facsimile: (215) 886-1909

Attorneys for Plaintiff Hendo Weernink

Dated: September 11, 2007

COUGHLIN STOIA GELLER RUDMAN &
ROBBINS LLP

By: David Rosenfeld / SR
Samuel H. Rudman
David A. Rosenfeld

58 South Service Road, Suite 200
Melville, NY 11747

Telephone: (631) 367-7100
Facsimile: (631) 367-1173

COUGHLIN STOIA GELLER RUDMAN &
ROBBINS LLP
Darren J. Robbins
David C. Walton
Catherine J. Kowalewski
655 West Broadway, Suite 1900
San Diego, CA 92101

Telephone: (619) 231-1058
Facsimile: (619) 231-7423

Attorneys for Plaintiff Scott Kairalla

Dated: September __, 2007

KLAFTER & OLSEN LLP

By: _____
Jeffrey A. Klafter

1311 Mamaroneck Avenue, Suite 220
White Plains, New York 10605

Telephone: (914) 997-5656
Facsimile: (914) 997-2444

KLAFTER & OLSEN LLP
Kurt B. Olsen
1250 Connecticut Ave., N.W., Suite 200
Washington, DC 20036

Telephone: (202) 261-3553
Facsimile: (202) 261-3533

Attorneys for Plaintiff Tim Radecki

Fax Server

Dated: September __, 2007

COUGHLIN STOIA GELLER RUDMAN &
ROBBINS LLP

By:

Samuel H. Rudman
David A. Rosenfeld

58 South Service Road, Suite 200
Melville, NY 11747

Telephone: (631) 367-7100
Facsimile: (631) 367-1173

COUGHLIN STOIA GELLER RUDMAN &
ROBBINS LLP

Darren J. Robbins
David C. Walton
Catherine J. Kowalewski
655 West Broadway, Suite 1900
San Diego, CA 92101

Telephone: (619) 231-1058
Facsimile: (619) 231-7423

Attorneys for Plaintiff Scott Kairalla

Dated: September 19, 2007

KLAFTER & OLSEN LLP

By:


Jeffrey A. Kairalla

1311 Mamaroneck Avenue, Suite 220
White Plains, New York 10605

Telephone: (914) 997-3656
Facsimile: (914) 997-2444

KLAFTER & OLSEN LLP

Kurt B. Olsen
1250 Connecticut Ave., N.W., Suite 200
Washington, DC 20036

Telephone: (202) 261-3553
Facsimile: (202) 261-3533

Attorneys for Plaintiff Tim Radecki

Dated: September 17, 2007

THE ROSEN LAW FIRM, P.A.

By: Lawrence Rosen / ss.
Phillip Kim
Lawrence Rosen

350 Fifth Avenue, Suite 5508
New York, New York 10118

Telephone: (212) 686-1060
Facsimile: (212) 202-3827

Attorneys for Plaintiff Benjamin Paul

Dated: September 19, 2007

BRODSKY & SMITH, LLC

By: Evan Smith / ss.
Evan J. Smith

240 Mineola Boulevard
Mineola, NY 11501

Telephone: (516) 741-4977
Facsimile: (516) 741-0626

SCHIFFRIN BARROWAY TOPAZ
& KESSLER, LLP
Richard A. Maniskas
D. Seamus Kaskela
280 King of Prussia Rd.
Radnor, PA 19087

Telephone: (610) 667-7706
Facsimile: (610) 667-7056

Attorneys for Plaintiff Alice Artis

SO ORDERED: 9/21/07
Paul A. Crotty
HON. PAUL A. CROTTY
UNITED STATES DISTRICT JUDGE